



DEPARTMENT OF
COMMERCE
COMMUNITY AND
ECONOMIC DEVELOPMENT

Regulatory Commission of Alaska

Sarah Palin, Governor
Emil Notti, Commissioner
Anthony A. Price, Chairman

August 1, 2007

Marlene H. Dortch
Federal Communications Commission
Office of the Secretary
445 12th Street, SW
Washington, D.C. 20554

Karen Majcher
Vice President – High Cost
& Low Income Division
Universal Service Administrative Company
2000 L Street, N.W.
Suite 200
Washington, D.C. 20036

**Re: CC Docket No. 96-45
Universal Service Support Certification (47 C.F.R. §§ 54.313-54.314)**

Dear Ms. Dortch and Ms. Majcher:

This letter is submitted pursuant to 47 C.F.R. §§ 54.313 and 54.314, both of which require state regulatory commissions to annually certify the use of federal universal service support as a prerequisite for continued receipt of funding by eligible telecommunications carriers (“ETCs”). The Regulatory Commission of Alaska (“RCA”) governs local services and rates in Alaska and is the appropriate authority to issue the certification required under Sections 54.313 and 54.314.

By order dated June 22, 2007, the RCA designated Copper Valley Wireless, Inc. (“CVW”) as an ETC in the study area served by Cordova Telephone Cooperative, Inc. pursuant to 47 U.S.C. § 214(e)(2).¹ The RCA’s Order designating CVW as an ETC is enclosed herewith as **Exhibit A**. Although CVW is a non-regulated wireless carrier, the RCA has directed CVW to file annual certifications with it concerning the company’s use of universal service support.²

¹ In this instance, the “study area” referred to is the study area used for state purposes and is equivalent to Cordova Telephone Cooperative, Inc.’s certificated service area.

² The RCA has opened a proceeding to consider whether rural wireless ETC, such as CVW, are no longer required to file annual certification with the RCA in light of the

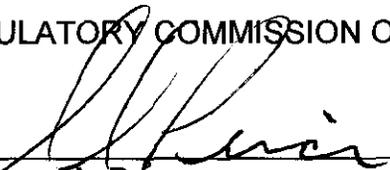
8/1/2007

This letter serves as a supplement to the RCA's 2007 annual certification to the Federal Communications Commission ("FCC") and the Universal Service Administrative Company ("USAC") dated September 29, 2006. CVW was designated as an ETC in the study area of Cordova Telephone Cooperative, Inc. on June 22, 2007 – after the annual certification deadlines set forth in 47 C.F.R. §§ 54.313(d) and 54.314(d) to allow CVW to receive high-cost universal service support in 2007.

Pursuant to new FCC Rules 54.313(d)(3)(vi) and 54.314(d)(6), the RCA must certify CVW's use of support to the FCC and USAC within sixty (60) days of the carrier's ETC designation to ensure that CVW is eligible to receive high-cost universal service support commencing the date of its ETC designation and for the remainder of 2007.

CVW has certified to the RCA that all federal high-cost universal service support received by it in Alaska for the above ETC service area will be used pursuant to 47 U.S.C. § 254(e). Accordingly, the RCA declares that, to the best of its knowledge and belief, all federal high-cost support to be received by CVW in the State of Alaska in calendar year 2007 will be used only for the provision, maintenance, and upgrading of facilities and services for which the support is intended, consistent with Section 254(e) of the Communications Act. Accordingly, the RCA certifies CVW's use of support in the State of Alaska for the 2007 calendar year so that the company may receive high-cost federal universal service support effective the date of its designation – June 22, 2007.

REGULATORY COMMISSION OF ALASKA



Anthony A. Price
Chairman

Attachment

current federal law that requires rural wireless ETCs to self certify directly to the FCC that funds will only be used for their intended purposes.

EXHIBIT A

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STATE OF ALASKA

THE REGULATORY COMMISSION OF ALASKA

Before Commissioners:

Kate Giard, Chairman
Dave Harbour
Mark K. Johnson
Anthony A. Price
Janis W. Wilson

In the Matter of the Application by Copper Valley)
Wireless, Inc. for Designation as an Eligible)
Telecommunications Carrier in the Study Area)
Served by the CORDOVA TELEPHONE)
COOPERATIVE, INC.)

U-07-15

ORDER NO. 3

ORDER DESIGNATING COPPER VALLEY WIRELESS, INC. AS AN
ELIGIBLE TELECOMMUNICATIONS CARRIER, REQUIRING FILINGS,
AND CLOSING DOCKET

BY THE COMMISSION:

Summary

We designate Copper Valley Wireless, Inc. (CVW) as an eligible telecommunications carrier (ETC) for purposes of receiving federal and state universal service funding throughout the study area served by Cordova Telephone Cooperative, Inc. (CTCI). We require CVW to file information annually describing its use of universal service funds (USF). We direct CVW to report any instance in which it is incapable of providing service to any customer upon reasonable request and any instance in which it is unable to provide enhanced 911 (E911) service to a public service answering point (PSAP) upon request. We require CVW to notify us if it petitions the Federal Communications Commission (FCC) for an extension of its current waivers of E911 requirements. We close this docket.

Regulatory Commission of Alaska
701 West Eighth Avenue, Suite 300
Anchorage, Alaska 99501
(907) 276-6222; TTY (907) 276-4533

1 Background

2 CVW requested designation as an ETC in the study area served by CTCL.¹
3 We found CVW's Request incomplete and required additional information.² CVW filed
4 the supplemental information on March 19, 2007.³ We issued public notice of CVW's
5 Request on March 28, 2007. We received no comments.

6 We requested additional information concerning CVW's calling plans,
7 investments, operating costs, and proposed use of universal service funds (USF).⁴
8 CVW filed the requested information on April 23, 2007.⁵

9 Discussion

10 ETC status allows a carrier to receive support from federal and state
11 universal service funding to provide, maintain, and upgrade facilities and services for
12 which the support is intended.⁶ Under the Telecommunications Act of 1996 (the Act),⁷ a
13 state commission designates a common carrier as an ETC.⁸ Under federal law, an ETC
14 must provide the supported universal telecommunications services throughout a defined
15 service area.⁹ In addition, the requesting carrier must meet the following criteria for

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17 ¹*Copper Valley Wireless, Inc.'s Application for Designation as an Eligible
18 Telecommunications Carrier in the Cordova Telephone Cooperative, Inc. Study Area,*
19 filed February 2, 2007 (Request).

20 ²*Order U-07-15(2), Order Finding Application Incomplete and Requiring Filing,*
21 dated February 23, 2007 (Order U-07-15(2)).

22 ³*Copper Valley Wireless, Inc.'s Resubmittal of Maps in Compliance with Order*
23 *U-07-15(2),* filed March 19, 2007 (Resubmittal).

24 ⁴Letter Order L0700122, dated April 9, 2007.

25 ⁵Letter from Michelle D. Barnett, filed April 23, 2007 (Response).

26 ⁶47 U.S.C. § 254(e).

⁷Telecommunications Act of 1996, Pub. L. No. 104-104, 110 Stat. 56 (1996),
amending the Communications Act of 1934, 47 U.S.C. §§ 151 *et seq.*

⁸47 U.S.C. § 214(e)(2); 47 C.F.R. § 54.201.

⁹47 C.F.R. § 54.201(d).

1 ETC status: (a) demonstrate that it owns some facilities; (b) demonstrate that it is
2 capable and committed to providing the nine basic services required by FCC
3 regulation;¹⁰ (c) reasonably show that granting designation as an ETC is in the public
4 interest; and (d) show that upon obtaining ETC status, the requesting carrier will be able
5 to offer and will advertise the availability of the services supported by federal USF.¹¹

6 Ownership of Facilities

7 CVW states it provides analog wireless service to approximately 200
8 customers in the CTCI study area.¹² CVW presently has two cell sites in the CTCI study
9 area.¹³ CVW provided maps showing its current coverage area in relation to its
10 proposed ETC service area.¹⁴ Although CVW's current facilities do not cover the entire
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12 ¹⁰47 C.F.R. § 54.101.

13 ¹¹47 U.S.C. § 214(e)(1) and (2) provide:

14 (1) Eligible telecommunications carriers

15 A common carrier designated as an eligible telecommunications carrier
16 under paragraph (2), (3), or (6) shall be eligible to receive universal
17 service support in accordance with section 254 of this title and shall,
18 throughout the service area for which the designation is received --

19 (A) offer the services that are supported by Federal universal
20 service support mechanisms under section 254(c) of this title, either
21 using its own facilities or a combination of its own facilities and resale of
22 another carrier's services (including the services offered by another
23 eligible telecommunications carrier); and

24 (B) advertise the availability of such services and the charges
25 therefore using media of general distribution.

26 (2) Designation of eligible telecommunications carriers

. . . Before designating an additional eligible telecommunications carrier
for an area served by a rural telephone company, the State commission
shall find that the designation is in the public interest.

¹²Request at 7.

¹³*Id.*

¹⁴Resubmittal.

1 CTCI service area, CVW states that access to federal and state USF will enable it to
2 upgrade and extend its network.¹⁵ CVW's lack of facilities throughout the proposed
3 ETC service areas at this time does not, in and of itself, make CVW ineligible for ETC
4 status. We determine that CVW has demonstrated that it meets the ownership of
5 facilities test.

6 Capability and Commitment

7 CVW must demonstrate its ability to provide each of the nine basic
8 services designated by the FCC, including Lifeline and Link Up services,¹⁶ or petition for
9 additional time to complete network upgrades.¹⁷ Although section 214(e)(1) of the Act
10 requires an ETC to offer the services supported by the federal universal service support
11 mechanisms, it does not require a competitive carrier to actually provide the supported
12 services throughout the designated service area before designation as an ETC.¹⁸ CVW
13 must demonstrate its commitment and plans to provide the supported services using
14 either its own facilities or a combination of its own facilities and resale.

15 In its Request, CVW states that it will offer the nine basic services,
16 including Lifeline and Link Up services, throughout the CTCL study area.¹⁹ CVW
17

18 ¹⁵CVW intends to upgrade its existing analog switch with digital code division
19 multiple access (CDMA) technology and to replace its existing Plexus analog cell sites
20 at Heney Ridge and Ski Hill with digital base stations. CVW also plans to add two new
21 cell sites at Flag Point and Johnstone Point. Request at 7-8.

22 ¹⁶The Link Up program is defined at 47 C.F.R. § 54.411(a), and the Lifeline
23 program is defined at 47 C.F.R. § 54.401(a).

24 ¹⁷The FCC permits a state commission to allow a carrier additional time to
25 complete network upgrades to provide single-party service, access to E911 service or
26 toll limitation. 47 C.F.R. § 54.101(c).

¹⁸*Federal-State Joint Board on Universal Service; Western Wireless Corporation
Petition for Preemption of an Order of the South Dakota Public Utilities Commission,
Declaratory Ruling, CC Docket No. 96-45, 15 FCC Rcd 15168, 15172-15174, ¶ 14
(2000).*

¹⁹Request at 9.

1 proposes a Lifeline discount of \$28.95 for a calling plan that retails for \$29.95 per
2 month²⁰ and includes 1200 minutes of local usage.²¹ CVW Lifeline customers in areas
3 where CVW is approved as an ETC will be allowed to call throughout the entire CVW
4 network as a "free" local call. CVW recently included Call Waiting and Call Forwarding
5 in its Lifeline Plan, and it will also include Voicemail, Caller ID, and Three-Way Calling in
6 its Lifeline plan for no additional charge after its CDMA upgrades are complete.²²
7 Link Up customers will receive a credit of \$17.50 for the service activation charge.²³
8 CVW states it will use 3 AAC 53.390(b) to determine if a customer qualifies for Lifeline
9 and Link Up assistance.²⁴ CVW states it will provide these services using either its own
10 facilities or resale of another carrier's services.²⁵

11 CVW commits to comply with the standards set forth in the Cellular
12 Telecommunications Industry Association Consumer Code for Wireless Service (CTIA
13 Consumer Code) and to report to us the number of consumer complaints per 1,000
14 handsets on an annual basis. We do not currently regulate the quality of service by
15 CVW, and we do not have sufficient evidence to define quality of service standards for
16 wireless carriers. If we receive customer complaints, we may examine whether CVW is
17 meeting its ETC obligations throughout the service area.²⁶ Additionally, CVW commits

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19 ²⁰Response.

20 ²¹Additional local minutes will be charged at \$0.20 per minute.

21 ²²Response.

22 ²³Request at 15 and Exhibit D.

23 ²⁴*Id.* at 16.

24 ²⁵Upon completion of its Proposed Network Improvement Plan, CVW will offer
25 the nine basic services, including Lifeline and Link Up services, throughout the
26 requested service area using CVW's new CDMA facilities. Request at 10.

²⁶Request at 20. CTIA, Consumer Code for Wireless Service, available at
http://files.ctia.org/pdf/The_Code.pdf.

1 to comply with requirements set out in the FCC Order²⁷ regarding the ability to remain
2 functional in an emergency situation.²⁸

3 CVW adopted the seven-step approach to meet its ETC obligations²⁹ to
4 offer services, upon reasonable request, throughout the proposed service area,
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11 ²⁷*Federal-State Joint Board on Universal Service, CC Docket No. 96-45, Report
and Order, 20 FCC Rcd 6371, ¶¶ 20 - 36 (2005) (FCC Order).*

12 ²⁸CVW stated that it has deployed at least eight hours of battery backup at each
13 cell site to ensure functionality in case of a power loss. Request at 20-21.

14 ²⁹CVW's seven-step plan for serving customers:

15 If a potential customer requests service and CVW can serve within its
16 existing network, CVW will immediately serve the customer. If the
customer is not in an area where CVW currently provides service, CVW
will:

- 17 Step 1: determine whether the customer's equipment can be modified
or replaced to provide acceptable service;
18 Step 2: determine whether a roof-mounted antenna or other network
equipment can be deployed at the premises to provide
19 service;
20 Step 3: determine whether adjustments at the nearest cell site can be
made to provide service;
21 Step 4: determine whether a cell-extender or repeater can be
employed to provide service;
22 Step 5: determine whether there are any other adjustments to network
or customer facilities that can be made to provide service;
23 Step 6: explore the possibility of offering the resold services of carriers
with facilities available to that location; and
24 Step 7: determine whether an additional cell site can be constructed
to provide service, and evaluate the benefit of using scarce
25 high-cost support to serve the number of customers
requesting service.

26 Request at 17-19.

1 including areas where it does not currently have facilities.³⁰ If it is unable to provide
2 service upon reasonable request without constructing a new cell site, CVW states it
3 would file a report with us estimating the cost of construction and stating its position on
4 whether the request for service is reasonable.³¹

5 We find that CVW's strategy for providing service throughout its proposed
6 ETC service area is reasonable. If CVW is unable to provide service to a customer in
7 response to a reasonable request, we require CVW to report to us. The report must
8 state the reason service cannot be provided, possible solutions for providing service,
9 estimated cost of any needed construction, CVW's position on whether the request for
10 service is reasonable, and whether high-cost funds should be expended on the
11 request.³² We will address any CVW reports of inability to provide service on a
12 case-by-case basis. If CVW fails to provide service to customers upon reasonable
13 request, we may reevaluate its eligibility for ETC status.

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18 ³⁰We have accepted the seven-step approach in other dockets approving
19 requests for ETC status: Docket U-06-143, titled *In the Matter of the Request by Alaska*
20 *DigiTel, LLC for Designation as an Eligible Telecommunications Carrier in the Glacier*
21 *State Study Area Served by ACS OF THE NORTHLAND, d/b/a ALASKA*
22 *COMMUNICATIONS SYSTEMS, ACS LOCAL SERVICE, and ACS*; Docket U-06-41,
23 titled *In the Matter of the Application by GCI COMMUNICATION CORP. d/b/a*
24 *GENERAL COMMUNICATION, INC. and GCI for Designation as an Eligible*
25 *Telecommunications Carrier in the Study Area Served by Matanuska Telephone*
26 *Association, Inc.*; and Docket U-06-3, titled *In the Matter of the Request by ALASKA*
DIGITEL, LLC for Designation as an Eligible Telecommunications Carrier in the Service
Area Currently Served by ACS OF FAIRBANKS, INC. d/b/a ALASKA
COMMUNICATIONS SYSTEMS, ACS LOCAL SERVICE, AND ACS.

³¹Request at 19.

³²We have imposed this requirement on other ETCs: Docket U-06-143, Docket
U-06-4, and Docket U-06-3, for example.

1 Public Interest Determination

2 We agree with the FCC's statement in its Virginia Cellular order that
3 evaluation of the public interest requires review of a variety of factors and cannot simply
4 rest on "increased competition."³³

5 CVW presents plans for upgrading its network to CDMA allowing it to
6 provide a stronger signal, increase network capacity, and offer advanced digital calling
7 features.³⁴ CVW plans to install two new cell sites in the Cordova area to improve and
8 expand existing coverage in addition to reducing the occurrence of dead spots and
9 dropped calls. CVW also states that network improvements will preserve and enhance
10 public safety by allowing it to meet all applicable requirements for E911 capabilities,
11 including customer location by PSAPs.

12 Advertising Services

13 Section 214(e)(1)(B) of the Act requires an ETC to advertise the
14 availability of the nine basic services, including Link Up and Lifeline and the charges for
15 those services, using media of general distribution. CVW agrees to comply with the
16 following outreach and advertising efforts:³⁵

- 17 1. once every two years, perform community outreach through
18 appropriate community agencies by notifying those agencies of CVW's
available services;
- 19 2. once every two years, post a list of its services on a school or
20 community center bulletin board in each of the utility's exchanges;
- 21 3. once a year, provide a bill stuffer indicating its available services; and

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23 ³³*Federal-State Joint Board on Universal Service, Virginia Cellular, LLC Petition*
24 *for Designation as an Eligible Telecommunications Carrier in the Commonwealth of*
25 *Virginia, CC Docket No. 96-45, Memorandum Opinion and Order, 19 FCC Rcd 1563*
26 *(2004) (Virginia Cellular).*

³⁴Request at 27-29.

³⁵Request at 21.

- 1 4. once a year, advertise its services through the newspaper circulated in
2 the locations served by CVW.

3 ETC Designation

4 We find that CVW has adequately demonstrated its capability and
5 commitment to meet the criteria for ETC status. CVW has demonstrated its capability to
6 provide quality service, mobility, new service choices, affordable service, service to
7 underserved and unserved customers, and improved public safety. We find that
8 designating CVW as an ETC is in the public interest. Therefore, we designate CVW as
9 an ETC in the CTCI study area.

10 Conditions on ETC Status

11 Annual Certification

12 We monitor the continued appropriate use of universal service funding in
13 our rural markets by requiring annual certification by all designated ETCs, including
14 wireless carriers. Accordingly, we require CVW to file the same information required of
15 all other rural ETCs in Alaska through our annual use-of-funds certification process.

16 Build-out Plans

17 CVW provided its build-out and service improvement plans in the
18 proposed service areas. CVW states its build-out and service improvement plans will
19 be made possible by the receipt of federal high-cost universal service support.³⁶ We will
20 monitor CVW's progress in its network expansion and upgrade based on the build-out
21 schedule provided in this Request. As discussed earlier in this order, we require CVW
22 to notify us in the event it is unable to provide service to a customer upon reasonable
23 request.

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26 ³⁶Request at 22-26.

1 E911

2 CVW states that the FCC granted it temporary waivers of different aspects
3 of the E911 location-capable handset deployment and penetration requirements for the
4 switch and cell sites located in the CTCI study area.³⁷ CVW states that if it is granted
5 ETC designation in the CTCI study area, it will use funds to convert its equipment from
6 analog to CDMA, enabling it to be fully compliant with the FCC's location-capable
7 handset requirements by the time its temporary waivers expire. We will reevaluate
8 CVW's eligibility for ETC status if it fails to complete its CDMA upgrades within the time
9 allowed by the FCC. Accordingly, we direct CVW to notify us if it petitions the FCC for
10 extensions of its current waivers of E911 service requirements.

11 We require CVW to report to us if it receives a request for E911 service
12 from a local PSAP and cannot provide that service. CVW's report should include the
13 PSAP request, whether CVW considers the request to be valid, and an explanation of
14 steps CVW would need to pursue to provide the E911 service.

15 Rulemaking Docket for ETC Designation

16 We opened a rulemaking docket to investigate the adoption of rules
17 pertaining to requests for ETC status.³⁸ Among other things, we will evaluate, for use in
18 our own proceedings, the possible adoption of some or all of the minimum eligibility
19 criteria adopted by the FCC for designation of an ETC.³⁹ For instance, the FCC stated
20 that it would require an ETC applicant to submit a formal network improvement plan that
21 demonstrates how universal service funds will be used to improve its service coverage,
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23 ³⁷*Copper Valley Wireless, Inc. Petition for Waiver of Temporary Stay, CC Docket*
24 *No. 94-102, Order, 21 FCC Rcd. 3778, ¶¶ 14, 18 (2006).*

25 ³⁸Docket R-06-3 is titled *In the Matter of the Consideration of Regulations*
26 *Regarding the Designation of Eligible Telecommunications Carriers.*

³⁹FCC Order.

1 signal strength, or capacity.⁴⁰ The FCC determined that an ETC should demonstrate its
2 ability to remain functional in emergency situations and that it offer a local usage plan
3 comparable to the one offered by the incumbent local exchange carrier in the service
4 area.⁴¹ Additionally, the FCC set the analytical framework it would use to determine
5 whether a carrier's ETC designation serves the public interest. We take notice that
6 CVW has agreed to comply with some of these FCC criteria even though we have not
7 required it. We advise CVW however that we may require existing ETCs to comply with
8 standards we adopt in our rulemaking docket.

9 Final Order

10 We comply with the deadline that required a final order be issued no later
11 than October 29, 2007,⁴² by issuing this final order on June 22, 2007. This order
12 constitutes the final decision in this proceeding. This decision may be appealed within
13 thirty days of the date of this order in accordance with AS 22.10.020(d) and the Alaska
14 Rules of Court, Rule of Appellate Procedure (Ak. R. App. P.) 602(a)(2). In addition to
15 the appellate rights afforded by AS 22.10.020(d), a party may file a petition for
16 reconsideration as permitted by 3 AAC 48.105. If such a petition is filed, the time period
17 for filing an appeal is then calculated under Ak. R. App. P. 602(a)(2).

18 Docket Closure

19 With this determination, no substantive or procedural issues remain in this
20 proceeding and there are no allocable costs under AS 42.05.651 and 3 AAC 48.157.
21 Accordingly, we close this docket.

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23 ⁴⁰FCC Order ¶ 21.

24 ⁴¹*Id.* at ¶¶ 68-72.

25 ⁴²Order U-07-15(1), *Order Addressing Timeline for Decision, Designating*
26 *Commission Panel, and Appointing Administrative Law Judge*, dated
February 13, 2007.

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ORDER

THE COMMISSION THEREFORE ORDERS:

1. Copper Valley Wireless, Inc. is designated as a carrier eligible to receive federal and state universal service support under the Telecommunications Act of 1996 in the study area served by Cordova Telephone Cooperative, Inc., effective the date of this order.

2. Copper Valley Wireless, Inc. shall file as if it were a regulated carrier in response to our requests for information for the annual use-of-funds certification to the Federal Communications Commission.

3. Copper Valley Wireless, Inc. shall advertise the supported services, including Lifeline and Link Up services, in accordance with the minimum criteria described in the body of this order.

4. Copper Valley Wireless, Inc. shall file a report, as described in the body of this order, if it is unable to provide service to a customer in its service area upon reasonable request.

5. Copper Valley Wireless, Inc. shall file notification if it petitions the Federal Communications Commission for extension of its current waivers of enhanced 911 requirements.

6. Copper Valley Wireless, Inc. shall file a report, as described in the body of this order, if it receives a request for enhanced 911 service from a public service answering point and is unable to provide the required service.

Regulatory Commission of Alaska
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7. Docket U-07-15 is closed.

DATED AND EFFECTIVE at Anchorage, Alaska, this 22nd day of June, 2007.

BY DIRECTION OF THE COMMISSION
(Commissioners Kate Giard and Mark K. Johnson,
not participating.)

(SEAL)



**The FCC Acknowledges Receipt of Comments From ...
Regulatory Commission of Alaska
...and Thank You for Your Comments**

Your Confirmation Number is: '200782952269 '

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Docket: 96-45

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